

November 19, 1987

CD-87-15 (LDV)

Dear Manufacturer:

SUBJECT: Proposed Optional Method for Assignment of Test
Vehicle Fuel Economy Dispositions

The purpose of this letter is to describe a proposal for a new optional method for assigning fuel economy test vehicle dispositions and request comments on the proposal. In particular, before EPA spends the resources to actually perform the computer programming, we would like to assess whether manufacturers would expect to use the system.

Over a year ago at a workshop on EPA's certification and fuel economy data system, several manufacturers asked if EPA could allow manufacturers to assign their own fuel economy dispositions. Without the dispositions being assigned, EPA's computer program will not accept a manufacturer's fuel economy label submissions. Hence, if EPA has not yet entered the dispositions when the manufacturer submits a label calculation, the manufacturer cannot obtain the computer generated receipt which allows the manufacturer to proceed with use of the label. EPA has been reluctant to grant manufacturers the ability to assign dispositions because this is an important control function EPA uses to assure the manufacturer uses only approved official data. On the other hand, entering the dispositions can be a labor intensive job, especially during peak periods when manufacturers submit large numbers of labels at once. Because of this, EPA has had the incentive to find a way for manufacturers to input dispositions.

We considered having a computer program automatically input the dispositions. However, there are a few special cases where the system cannot be automatic. Therefore, we have developed a variation on this approach which will preserve the control function we need but give the manufacturers the ability to proceed with inputting the dispositions in the vast majority of the cases. Under the proposed system, EPA would provide a computer program designed to check manufacturer assigned dispositions. The manufacturer would access this program, input answers to a few basic questions, and then input the fuel

economy dispositions. The program would check the dispositions against EPA standard decision rules and, if the program agrees with the input dispositions, it would allow the dispositions to be automatically entered into the data base. In the few special cases where a standard decision rule does not apply, the program will notify the manufacturer that it must contact EPA to enter the disposition. To preserve EPA's necessary control function, EPA will have the ability to override the system. If EPA enters dispositions, the manufacturer will not be able to change them.

The proposed system would only involve the fuel economy dispositions designated "used for fuel economy" and "not used for fuel economy." EPA also plans to automate the assignment of certification dispositions. However, this change should not have an impact on manufacturers because it is a simple pass/fail decision that the computer can do.

The proposal is described in more detail in the enclosure to this letter. If this method is adopted, manufacturers will be forwarded full instructions on accessing and operating the computer program.

The proposed program would be optional for the manufacturer to use. EPA will continue to enter the dispositions as it currently does for those manufacturers who do not wish to use the system. Your comments are important before we commit resources to implement this system. If there is not sufficient interest in the proposal, we do not wish to proceed with the resource expenditure. If there are concerns about this proposal that would prevent you from using the system but you are interested in the concept, we would be interested in your recommendations for resolving those concerns. If there is sufficient interest based on comments, a workshop will be held to discuss this proposal further. Please forward your comments, or at least a statement of your interest in using the proposed system, by December 16, 1987 to Eldert Bontekoe of the Certification Branch.

Sincerely,

Thomas M. Ball, Chief
Certification Branch

Certification Division
Office of Mobile Sources

Enclosure

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ENCLOSURE

EPA DISPOSITION ASSIGNMENT PROPOSAL

The basic EPA proposal is that manufacturers, at their option, may directly source an EPA computer program to assign fuel economy test vehicle dispositions. To participate in this optional procedure, the manufacturer must have access to an MTS computer account (most manufacturers have the required computer account). The manufacturer must also pay the associated MTS computer charges involved in using this program. Since the manufacturer is directly sourcing the computer program, the computer can assign the fuel economy disposition immediately. With many other electronic data transfers involving EPA, the manufacturer only loads the data into a file which the EPA program processes each night. Consequently, the manufacturer must wait until the next day to receive the results. The procedure we are proposing will not result in such delays.

Outline of Proposal

1. The manufacturer could only assign fuel economy test vehicle dispositions through the use of an EPA computer program which audits the manufacturer assignment. If the manufacturer assigns a disposition contrary to the usual disposition assignment procedures, the program will reject the disposition and inform the manufacturer to contact their certification representative to assign the disposition.

2. Once a test disposition has been assigned a manufacturer cannot change it. EPA personnel will be able to change a test disposition or assign one initially. A manufacturer must contact their EPA representative if an incorrect assignment is made or if the computer cannot assign a certain test disposition. EPA can also change a test disposition if it is determined that an incorrect assignment has been made.

3. Before dispositions can be assigned, the program will prompt the manufacturer to answer a series of questions. These questions are asked as a reminder to the manufacturer of what should be cleared before disposition assignment. Incorrect

answers to these questions will be a basis to void label calculations and CAFE's which use the incorrect dispositions.

4. The computer program will assure that the manufacturer will not assign other manufacturers' dispositions.

5. Dispositions may not be assigned to EPA tests until the data has been validated. This is normally accomplished within one day and is often completed the same day as the test.

6. Certification test vehicle dispositions will be assigned automatically by an EPA computer program. This program uses the emission standards and deterioration factors provided by the manufacturer on the ESI sheet. Manufacturers should assure that these entries are correct before submitting any test data.